

DOCKET NO. FBT-CV-20-6097623-S : SUPERIOR COURT  
MARK DEMING : J.D. OF BRIDGEPORT/FAIRFIELD  
V. : AT BRIDGEPORT  
TRUMBULL BOARD OF EDUCATION : OCTOBER 20, 2020

**ANSWER AND SPECIAL DEFENSE**

**FIRST COUNT**

1. With respect to paragraph 1, the defendant does not have sufficient information or knowledge upon which to form a belief and, therefore, leaves the plaintiff to his proof.

2. The allegations in paragraph 2 are admitted.

3. The allegations in paragraph 3 are admitted.

4. Defendant admits that Plaintiff was notified in writing of his appointment as Director of Facilities on or about June 19, 2014. The remaining allegations in paragraph 4 are denied.

5. Defendant admits that Plaintiff signed the appointment letter on or about June 19, 2014. The remaining allegations in paragraph 5 are denied.

6. The document referred to in paragraph 6 speaks for itself; however, to the extent it constitutes an allegation, the defendant does not have sufficient information or knowledge upon which to form a belief and, therefore, leaves the plaintiff to his proof.

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7. The document referred to in paragraph 7 speaks for itself; however, to the extent it constitutes an allegation, the defendant does not have sufficient information or knowledge upon which to form a belief and, therefore, leaves the plaintiff to his proof.

8. The allegations in paragraph 8 are denied.

9. The allegations in paragraph 9 are denied.

10. The document referred to in paragraph 10 speaks for itself; however, to the extent it constitutes an allegation, the defendant does not have sufficient information or knowledge upon which to form a belief and, therefore, leaves the plaintiff to his proof.

11. With respect to paragraph 11, the defendant does not have sufficient information or knowledge upon which to form a belief and, therefore, leaves the plaintiff to his proof.

12. The allegations in paragraph 12 are denied.

13. Defendant is without sufficient knowledge or information as to form belief as to the truth of the allegations in paragraph 13 and leaves Plaintiff to his proof.

14. Defendant admits that Superintendent Iassogna notified Plaintiff of the termination of employment effective February 7, 2020 by letter dated January 24, 2020. The remaining allegations in paragraph 14 are denied.

15. Defendant admits it received a letter from Plaintiff's counsel dated February 5, 2020, the contents of which speak for itself. Defendant further admits that the Plaintiff was terminated effective February 7, 2020. The remaining allegations in paragraph 15 are denied.

16. The allegations in paragraph 16 are denied.

17. The allegations in paragraph 17 are denied.

## **SECOND COUNT**

1.-11. Defendant's responses to paragraphs 1 through 11, inclusive, of the First Count are incorporated by reference as Defendant's response to paragraphs 1 through 11, inclusive, of the Second Count as though fully recited and set forth herein.

12. The allegations in paragraph 12 are denied.

13. Defendant is without sufficient knowledge or information so as to form a belief as to the truth of the allegations in paragraph 13 and leaves Plaintiff to his proof.

14. Defendant admits that Superintendent Iassogna notified Plaintiff of the termination of employment effective February 7, 2020 by letter dated January 24, 2020. The remaining allegations in paragraph 14 are denied.

15. Defendant admits it received a letter from Plaintiff's counsel dated February 5, 2020, the contents of which speak for itself. Defendant further admits that Plaintiff was terminated effective February 7, 2020. The remaining allegations in paragraph 15 are denied.

16. The allegations in paragraph 16 are denied.

17. The allegations in paragraph 17 are denied.

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## FIRST SPECIAL DEFENSE

The plaintiff has failed to state a legally cognizable claim upon which relief may be granted.

THE DEFENDANT  
TRUMBULL BOARD OF EDUCATION

BY 

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### CERTIFICATION

This is to certify that a copy of the foregoing was, or will immediately be mailed or delivered electronically, or non-electronically, on this 20<sup>th</sup> day of October, 2020 to all counsel and self-represented parties of record and that written consent for electronic delivery was received from all counsel and self-represented parties of record who were or will immediately be electronically served as follows:

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